

EMAIL COMMENT

**From:** Doug Beyerlein [mailto:beyerlein@clearcreeksolutions.com]

**Posted At:** Wednesday, June 08, 2011 9:09 PM

**Posted To:** SW Permit Comments

**Conversation:** Comments on Phase I and Phase II LID Performance Standard

**Subject:** Comments on Phase I and Phase II LID Performance Standard

Comment on:

Phase I Municipal Stormwater General Permit

APPENDIX 1 – Minimum Technical Requirements for New Development and Redevelopment

4.5 Minimum Requirement #5: On-Site Stormwater Management

Low Impact Development Performance Standard

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It is almost technically impossible to design a LID outlet structure to meet the 8% of the 2-yr flow duration standard. Even with a stand pipe and bottom orifice (which most LIDs do not have) 8% of the 2-yr flow is very difficult to meet and will probably require an outlet control orifice smaller than the 1/2-inch minimum orifice diameter limitation. My experience modeling LIDs is that LIDs by themselves rarely meet Ecology's flow control standard minimum threshold of 50% of the 2-year flow. The exception is when you can get 100% infiltration with a LID (for example, porous pavement). However, the vast majority of the time it will be necessary to add a conventional stormwater control facility downstream of the LID to achieve compliance with the flow control standard. As a result, there really is no technical reason why Ecology should require a LID performance standard that is any different than the existing flow control standard (50% of the 2-yr to the 50-yr).

Comment on:

Phase II Western Washington Municipal Stormwater General Permit

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